ENVIRONMENTAL CONTRACTING UPDATE

AIR FORCE SYSTEMS AND LOGISTICS CONTRACTING COURSE

ENVIRONMENTAL CONTRACTING

- OVERVIEW OF THE ISSUES
  - ➡COMPLIANCE
    - – LAWS, REGULATIONS, EXECUTIVE ORDERS
  - CLEAN-UP
    - – GOVERNMENT FAILED TO COMPLY
- ENVIRONMENTAL CONTRACTING IS PURCHASING THOSE PRODUCTS AND SERVICES THAT ARE ENVIRONMENTALLY SOUND

COMBINATIONS

- HALE BUSINESS, MARY KAY, FULLER BRUSH AND GRACE CO
- POLYGRAM RECORDS, WARNER BROTHERS, AND KEEBLER
- ZIPPO, AUDI, DOFASCO AND DAKOTA MINING
- FEDERAL EXPRESS AND UPS
- KNOTT'S BERRY FARM/NATIONAL ORGANIZATION OF WOMEN

DISCUSSION TOPICS

- CONGRESSIONAL ISSUES
- RECYCLED MATERIALS
  - ➡ EXECUTIVE ORDER 13101
  - EPA GUIDANCE
- GREENING THE GOVERNMENT
  - EO 13123 - ENERGY EFFICIENCY
  - EO 13149 - FLEET MANAGEMENT
  - EO 13148 - LEADERSHIP

CONGRESSIONAL ISSUES

- S. 2474
- H.R. 3766
- HASC READINESS MARKUP
- FY 2000 APPROPRIATION ACT, SECTION 8149

A-76

• Savings achieved through the A-76 process are instrumental in our efforts to reduce infrastructure costs and thereby provide funds for critical modernization/readiness issues

- AF achieved $8.2B savings over past 10 years
  - **Not just about savings but discovering more efficient ways to accomplish AF mission**
- Largest studies (BOS) ongoing
  - **Offutt, Sheppard, Lackland, Maxwell, Keesler AFBs**
- Majority of AF competitions will conclude in FY00-02
- According to HASC Staffer, AF only agency able to show projected savings will be realized

• Truthfulness, Responsibility, and Accountability in Contracting Act - HR 3766

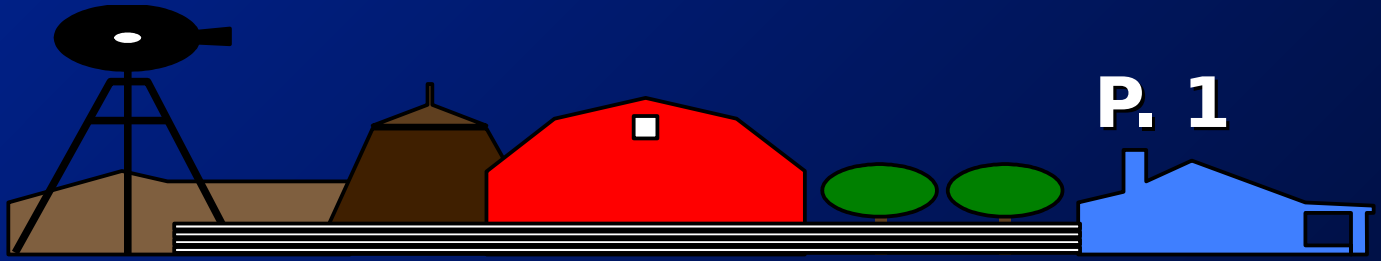
- Introduced by CM Wynn and 62 members of House
- Findings: Federal employees being replaced by contractors with no proof of reduced costs or improved services
- Purpose: suspend new service contracting until reliable reporting systems established and until services stop giving work to contractors without competition
- Temporary suspension of new contracting out, privatization, outsourcing, contracting and other such initiatives. This includes housing and utility privatization initiatives and A-76 actions.

• Section 331 of HASC Authorization Bill - Inclusion of Additional Information in Reports to Congress Required before Conversion of Commercial or Industrial Type Functions to Contractor Performance

- Amends 10 United States Code 2461; Requirements:
  - **Certification funds are specifically budgeted to pay for cost analysis**
  - **Date when analysis of function for possible change commenced**
  - **Number of DOD civilians performing function when study commenced**
  - **Number of employees adversely affected by implementing MEO**
  - **Number of employees adversely affected by awarding contract**
- Air Force not opposed to new reporting requirements

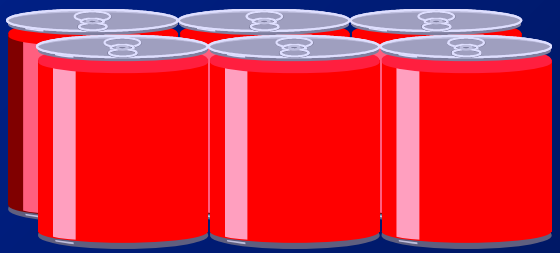
BACKGROUND: PROCUREMENT IMPACT

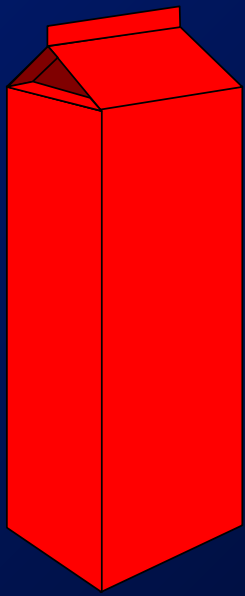
- PROCUREMENT PROCESS
- INFLUENTIAL EFFECT
- ENVIRONMENTAL CHANGE
- FUTURE GENERATIONS.

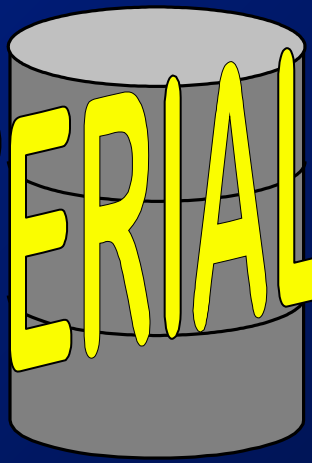


BACKGROUND: IMPACT--TWO TYPES

- ENVIRONMENTALLY SAFE CONTRACTING
- PURCHASE RESTRICTIONS







RECOVERED MATERIALS

AIR FORCE AUDIT AGENCY REPORT - AFFIRMATIVE PROCUREMENT PROGRAM

- INSTALLATION MANAGERS DID NOT EFFECTIVELY IMPLEMENT
- LITTLE PROGRAM AWARENESS AND RECYCLED MATERIAL PURCHASES
- IMPAC - NO CONSISTENT GUIDANCE, OVERSIGHT, OR TRAINING
  - ➡NOT BUYING RECYCLED PAPER
- CE CONSTRUCTION DESIGN CHIEFS NOT REVIEWING SPECIFICATIONS

STATUTORY REQUIREMENTS

- **FEDERAL AGENCIES MUST:**
  - ➡ **PROCURE ITEMS COMPOSED OF THE HIGHEST % OF RECOVERED MATERIALS <u>PRACTICABLE</u> AND…**
  - **<u>MAINTAIN A SATISFACTORY LEVEL OF COMPETITION.</u>**
  - **42 USC 6962, FAR 23.403.** **P. 5**

EXECUTIVE ORDER 13101

- SIGNED 14 SEP 98
- VICE EXECUTIVE ORDER 12873
- GOAL: TO IMPROVE THE FEDERAL GOVERNMENT'S USE OF RECYCLED PRODUCTS AND ENVIRONMENTALLY PREFERABLE PRODUCTS AND SERVICES

DEFINITIONS

- **ENVIRONMENTALLY PREFERABLE: PRODUCTS OR SERVICES THAT HAVE A LESSER OR REDUCED EFFECT ON HEALTH AND ENVIRONMENT WHEN COMPARED WITH COMPETING PRODUCTS OR SERVICES (RAW MATERIALS, MANUFACTURING, PACKAGING, REUSE, OR DISPOSAL)** P.6

DEFINITIONS

- ACQUISITION: ACQUIRING BY K
- BEGINS AT THE POINT WHEN AGENCY NEEDS ARE ESTABLISHED AND INCLUDES SOLICITATION, FINANCING, AND CONTRACT ADMINISTRATION
- KEY TO DEFINITION - MUST CONSIDER PURCHASE THROUGHOUT PROCESS

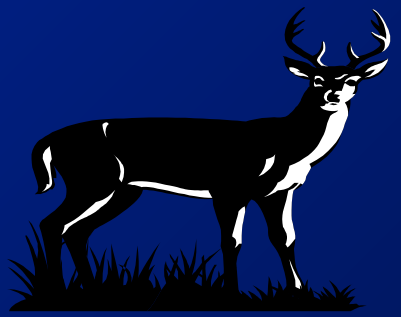
RECOVERED MATERIALS

- WASTE MATERIALS AND BY-PRODUCTS THAT HAVE BEEN RECOVERED OR DIVERTED FROM SOLID WASTE
- BASICALLY WHAT WE THINK OF AS RECYCLED MATERIALS, SUCH AS ALUMINUM, PAPER, ETC.

WASTE PREVENTION

- ANY CHANGE IN THE DESIGN, MANUFACTURING, PURCHASE OR USE OF PRODUCTS TO REDUCE THEIR AMOUNT OF TOXICITY BEFORE THEY ARE DISCARDED
- REUSE OF PRODUCTS OR MATERIALS
- PART OF OVERALL DEFINITION OF WASTE REDUCTION WHICH ALSO INCLUDES RECYCLING AND PURCHASING ENVIRONMENTALLY PREFERABLE PRODUCTS P.7

DEFINITION



- **LIFE CYCLE COST: ANNUAL COST OF A PRODUCT INCLUDING CAPITAL COSTS, INSTALLATION COSTS, OPERATING COSTS, AND DISPOSAL COSTS OVER THE LIFETIME OF THE PRODUCT**
- **COST IS MAJOR EXCUSE FOR NOT PURCHASING**

DEFINITION

- POLLUTION PREVENTION: SOURCE REDUCTION AND OTHER PRACTICES THAT REDUCE OR ELIMINATE POLLUTION CREATION:
  - ➡ INCREASED EFFICIENCY IN THE USE OF RAW MATERIALS, ENERGY, WATER
  - PROTECTION OF NATURAL RESOURCES BY CONSERVATION P.7

MORE DEFINITIONS

- **Contractor (Ktor) - A gambler who never gets to shuffle, cut, or deal.**
- **Bid Opening - A poker game in which the losing hand wins.**
- **Bid - A wild guess carried out to two decimal points**

STILL MORE DEFINITIONS

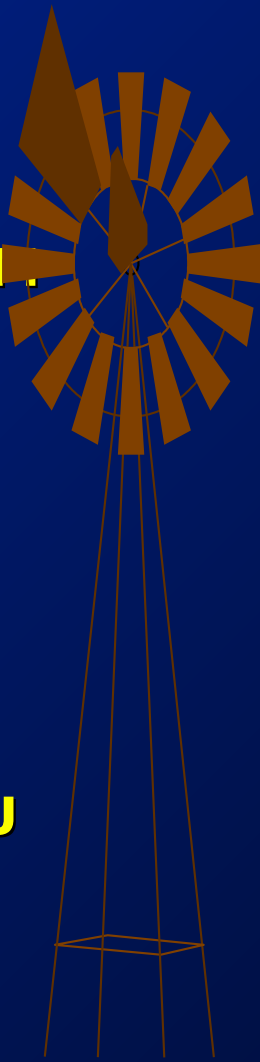
- **Low Bidder - A Ktor who is wondering what it left out of its bid.**
- **Completion Date - The point at which liquidated damages begin.**
- **Liquidated Damages - A penalty for failing to achieve the impossible.**

AND LAST BUT NOT LEAST

- **Auditor - People who go in after the war is lost and bayonet the wounded.**
- **Lawyer - People who go in after the auditor and strip the bodies.**
- **Arbitrator - a cook that leaves Arby's to work at McDonald's**
- **Sudafed - brought litigation against a government official**

IMPLEMENTATION

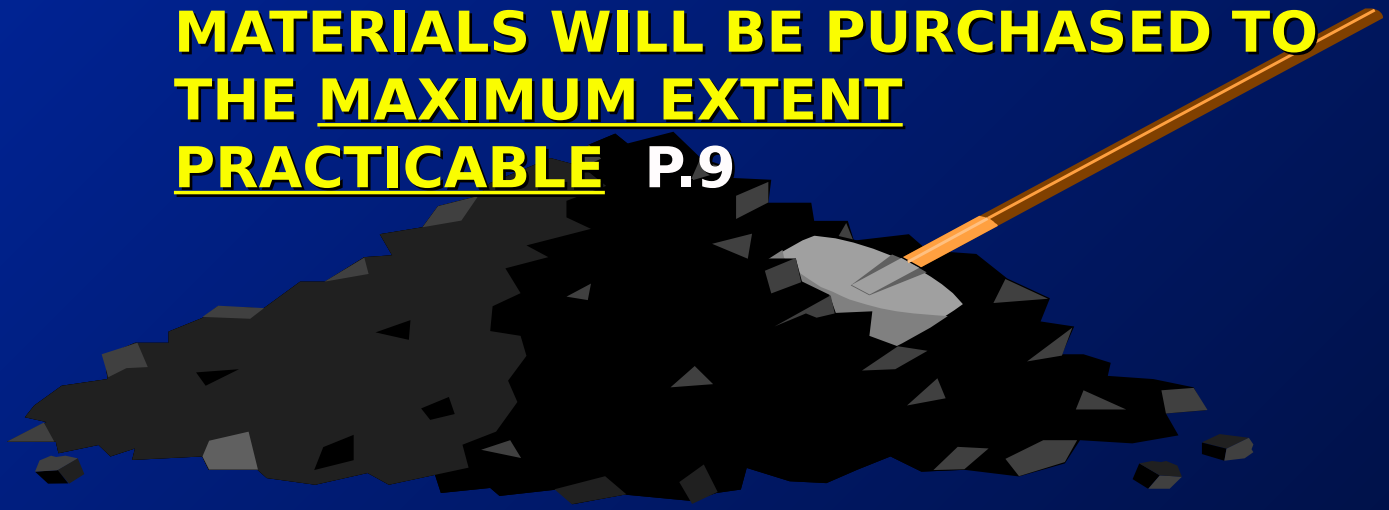
- DEVELOP COST EFFECTIVE PROCUREMENT PREFERENCE PROGRAM
  - FAVORING PURCHASE OF ENVIRONMENTALLY SOUND
  - WHERE PRICE AND OTHER FACTORS ARE EQUAL
  - PROVIDE OPEN COMPETITION BETWEEN RECOVERED AND VIRGIN MATERIALS
  - WHAT OTHER FACTORS SHOULD YOU CONSIDER? P. 8



AFFIRMATIVE PROCUREMENT PROGRAM

➡ **EXECUTIVE ORDER 13101**

- **ASSURES SPECIFIC ITEMS COMPOSED OF RECOVERED MATERIALS WILL BE PURCHASED TO THE MAXIMUM EXTENT PRACTICABLE P.9**



EPA GUIDELINE ITEMS

- ***55*** **LISTED ITEMS**
  - **ORIGINAL ITEMS (5)?**
  - **OTHERS WILL BE LISTED**
    - **NEW ITEM IMPLEMENTED W/IN 1 YEAR**
- **RECOVERED MATERIALS**
- **PROCUREMENTS > $10,000**
- **MANDATORY UNLESS EXEMPT**
- **P. 9 P. 11**

EXCEPTIONS

- **WRITTEN JUSTIFICATION THAT:**
  - **PRODUCT NOT AVAILABLE:**
    - **COMPETITIVELY**
    - **WITHIN A REASONABLE AMOUNT OF TIME**
  - **PERFORMANCE STANDARDS**
  - **EFFICIENCY/COST EFFECTIVENESS**
  - **UNREASONABLE PRICE**
  - **BELOW MICROPURCHASE THRESHOLD**
  - **AGGREGATE PURCHASES FOR ECONOMY AND EFFICIENCY**

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EPA GUIDANCE

- PUBLISHED 20 AUGUST 1999
- 64 FEDERAL REGISTER 45809
- REQUIRED UNDER EO 13101
- GUIDANCE PROVIDED UNDER EO 12873 BUT MAJOR CHANGES

ADDITIONAL GUIDANCE

- A BUS STATION IS WHERE A BUS STOPS, A TRAIN STATION IS WHERE A TRAIN STOPS. ON MY DESK, I HAVE A WORK STATION
- SINCE LIGHT TRAVELS FASTER THAN SOUND, ISNT THAT WHY SOME PEOPLE APPEAR BRIGHT UNTIL YOU HEAR THEM SPEAK?

MORE GUIDANCE

- WHY IS ABBREVIATED SUCH A LONG WORD?
- IF IT'S ZERO OUTSIDE TODAY AND SUPPOSED TO BE TWICE AS COLD TOMORROW, HOW COLD IS IT GOING TO BE?
- IF A COW LAUGHED WOULD MILK COME OUT HER NOSE?
- WHAT IS THE SPEED OF DARK?

EPA GUIDANCE: APPLICABILITY

- ALL ACQUISITIONS
  - PRODUCTS, SERVICES, CONSTRUCTION
- ALL CONTRACT TYPES
  - SIMPLIFIED ACQUISITIONS
  - SEALED BIDDING
  - NEGOTIATIONS
  - COMMERCIAL ITEMS?

GUIDING PRINCIPLE 1

- ENVIRONMENTAL CONSIDERATIONS SHOULD BECOME
- PART OF NORMAL PURCHASING
- CONSISTENT WITH TRADITIONAL FACTORS SUCH AS:
- PRODUCT SAFETY, PRICE, PERFORMANCE, AVAILABILITY
- BECOME PART OF COMPETITION
- HOW TO IF IT COSTS MORE?

GUIDING PRINCIPLE 2

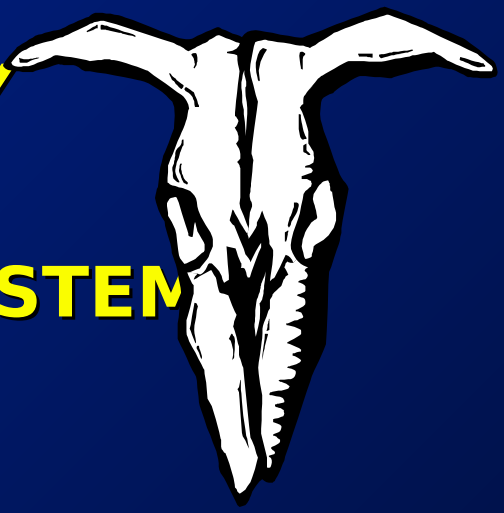
- POLLUTION PREVENTION SHOULD BE THE PRIMARY MOTIVATION AND STRATEGY FOR IMPLEMENTATION OF ENVIRONMENTALLY PREFERABLE PURCHASING
- BEGIN EARLY IN THE PROCESS
- ACQUISITION STRATEGIES:
  - ➡CUSTOMIZED PURCHASES
  - SYSTEMS ANALYSIS APPROACH
  - IS PRODUCT NECESSARY?
- EXAMPLES?

GUIDING PRINCIPLE 3

- ENVIRONMENTAL PREFERABILITY IS A FUNCTION OF MULTIPLE ATTRIBUTES FROM A LIFE CYCLE PERSPECTIVE
- LIFE CYCLE STAGES
  - ➡ DESIGN, PRE, MANUFACTURE, PACKAGING, USE/REUSE, DISPOSAL
- FACTORS
  - TYPE OF PRODUCT/SERVICE, INFORMATION AND TOOLS AVAILABLE

GUIDING PRINCIPLE 3

- MULTIPLE ENVIRONMENTAL ATTRIBUTES
- ENERGY EFFICIENCY
- REDUCED TOXICITY
- IMPACTS ON ECOSYSTEM
- OTHERS?



GUIDING PRINCIPLE 4

- ENVIRONMENTAL PREFERABILITY MIGHT INCLUDE COMPARISON OF IMPACTS
  - ➡REVERSIBILITY
  - GEOGRAPHIC SCALE
  - HIERARCHY?
    - RECOVERY TIME
    - GEOGRAPHIC SCALE?
    - DIFFERENCES AMONG COMPETING PRODUCTS
    - HUMAN HEALTH - STRESSORS?

GUIDING PRINCIPLE 5

- COMPREHENSIVE, ACCURATE, AND MEANINGFUL INFORMATION ABOUT THE ENV. PERFORMANCE OF PRODUCTS/SERVICES IS NECESSARY TO DETERMINE ENVIRONMENTAL PREFERABILITY
- WHAT/HOW IS IT CONVEYED?
  - ➡MANUFACTURERS INFORMATION?
  - NON-GOVERNMENTAL ENTITIES
  - GREEN GUIDES

ENFORCEMENT

- CONGRESSIONAL CONCERNS
  - ➡10% PRICE PREFERENCE
  - SANCTIONS ON K OFFICER
- AGENCY ENVIRONMENTAL EXECS
  - MUST TRACK PURCHASES
  - REPORT AND JUSTIFY PURCHASES
  - REPORT PROVIDED TO THE PRESIDENT EO13101

CHANGES TO THE FAR

- PROPOSED RULES
- 64 FEDERAL REGISTER 51656
- SEPTEMBER 23, 1999
- ADDS CHANGES DUE TO EXECUTIVE ORDER 13101
- NOT INTERIM OR FINAL RULE YET

ENERGY EFFICIENCY

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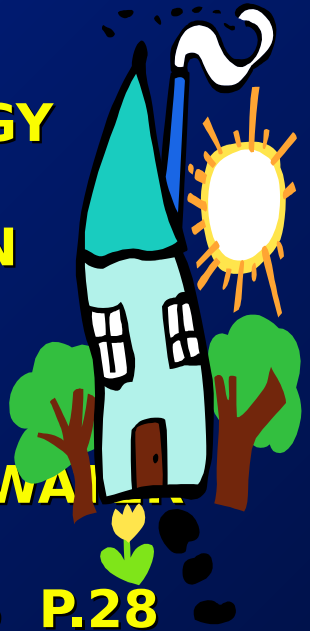
EXECUTIVE ORDER 13123

- JUNE 3, 1999
- INTENT:
  - AS THE NATION'S LARGEST ENERGY CONSUMER, SHALL SIGNIFICANTLY IMPROVE ITS ENERGY MANAGEMENT IN ORDER TO SAVE TAXPAYER DOLLARS AND REDUCE EMISSIONS THAT CONTRIBUTE TO AIR POLLUTION AND GLOBAL CLIMATE CHANGE P.28
  - APPLICABILITY - ALL DEPTS/FED AGENCIES, ALL CONTRACTS (PRODUCTS, SERVICES, CONSTRUCTION)

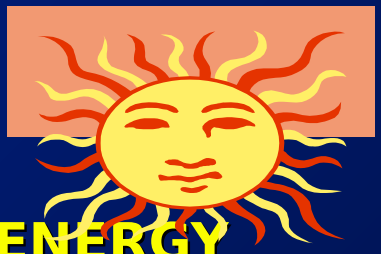
WHY?

- BEST ABLE TO AFFECT CHANGE
- 500,000 BUILDINGS
  - ➡CAN LEAD THE NATION IN ENERGY EFFICIENT BUILDING DESIGN, CONSTRUCTION AND OPERATION
- $200 BILLION ANNUAL ON PRODUCTS AND SERVICES
  - PROMOTE ENERGY EFFICIENCY, WA… CONSERVATION AND USE OF RENEWABLE ENERGY PRODUCTS P.28



GOALS

- **ENERGY EFFICIENCY**
  - **REDUCE ENERGY CONSUMPTION**
    - **30% BY 2005/35% BY 2010**
  - **INDUSTRIAL/LABORATORIES**
    - **20% BY 2005/25% BY 2010**
  - **EXPAND USE OF RENEWABLE ENERGY**
  - **PETROLEUM-SWITCH TO NATURAL GAS, < USE, IMPROVING EFFICIENCY**
  - **INCREASE WATER CONSERVATION**
  - **MISSION SOLAR ROOFS INITIATIVE**



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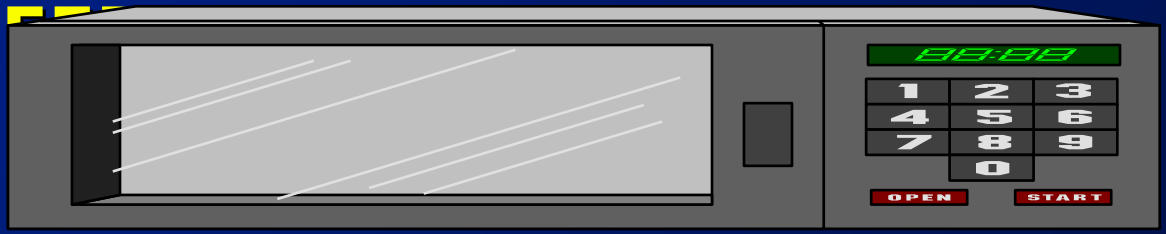
ENERGY EFFICIENCY

- PRODUCT IN THE UPPER 25% OF EFFICIENCY FOR ALL SIMILAR PRODUCTS OR IF EFFICIENCY STANDARDS, A PRODUCT AT LEAST 10% MORE EFFICIENT THAN MINIMUM

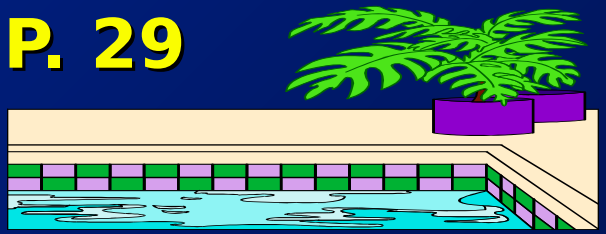


DEFINITIONS

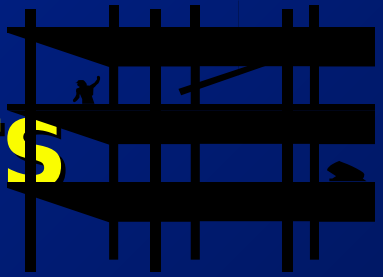
- ENERGY-SAVINGS PERFORMANCE K:
- DESIGN, ACQUISITION, FINANCING, INSTALLATION, TESTING AND OPERATION OF ENERGY OR WATER CONSERVATION MEASURES
- CONTRACTOR INCURS COSTS IN EXCHANGE FOR SHARE OF VALUE OF ENERGY SAVINGS
  P.29

FACILITY

- INDIVIDUAL/COLLECTION OF BUILDINGS, GROUNDS, OR STRUCTURE
  - ➡INCLUDES: FIXTURES, SUPPORT SYSTEMS
- LEASED FACILITIES RULES
- GOCO P. 29



REQUIREMENTS



- ENERGY STAR
- INSERTED IN ALL SPECIFICATIONS
- NEW CONSTRUCTION AND RENOVATION CONTRACTS
- PRODUCT SPECIFICATIONS
  - ➡BASIC ORDERING AGREEMENTS
  - BLANKET PURCHASE AGREEMENTS
  - GOVT WIDE ACQUISITION CONTRACTS P.31

MODEL LEASE PROVISIONS

- PROVISIONS MUST ENCOURAGE ENERGY AND WATER EFFICIENCY
- BUILD TO SUIT LEASE SOLICITATIONS
  - ➡SUSTAINABLE DESIGN, ENERGY EFFICIENCY AND VERIFICATION
- ENERGY STAR BUILDING LABEL P.31

HIGHLY EFFICIENT SYSTEMS

- DISTRICT ENERGY SYSTEMS
- NEW CONSTRUCTION OR RETROFIT PROJECTS
- COMBINED COOLING, HEAT, AND POWER WHEN UPGRADING AND BUILDING NEW
- INDUSTRIAL FACILITY IMPROVEMENTS P.32

ELECTRICITY PROCUREMENT

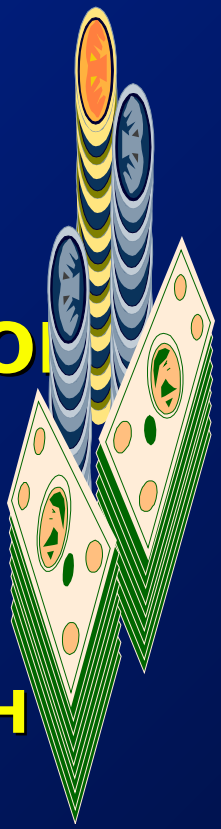
- CLEAN, EFFICIENT, RENEWABLE
- COMPETITIVE POWER
- REDUCED GREENHOUSE GASES
- RENEWABLE SOURCES
  - ➡SHOULD INCLUDE IN SOLICITATIONS
  - USE SAVINGS TO PAY COSTS?
  - TRIPLE NONHYDROELECTRIC RENEWABLE ENERGY CAPACITY BY 2010 P.32

EXEMPTIONS

- IMPAIRS/ADVERSELY AFFECTS MILITARY OPERATIONS/TRAINING
  - ➡INCLUDES: TACTICAL AIRCRAFT, SHIPS, WEAPON SYSTEMS, COMBAT TRAINING, BORDER SECURITY
- LIFE-CYCLE COST EFFECTIVE
- DOE WILL ESTABLISH OTHERS
  - COMMERCIAL AVAILABILITY, SIGNIFICANT COST DIFFERENCE, PERFORMANCE REQUIREMENTS, AGENCY MISSION

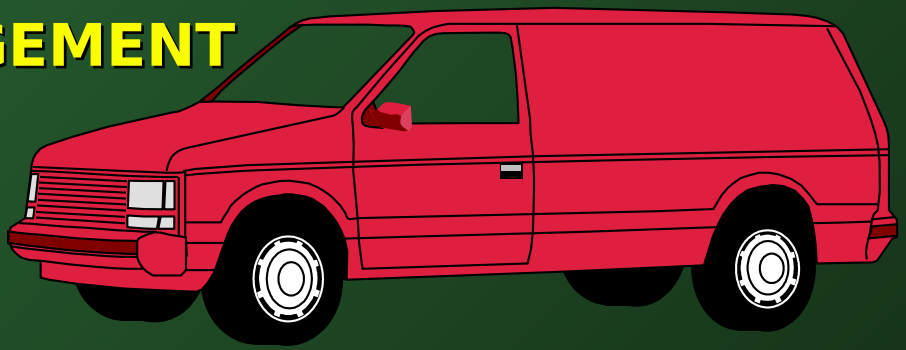
FUNDING

- ANNUAL BUDGET SUBMISSIO
- OMB GUIDELINES
- OMB ESTABLISH A FUND
  - ➡ FINANCE EXEMPLARY ENERGY MANAGEMENT ACTIVITIES WITH HIGHER INITIAL COSTS BUT LOWER LIFE CYCLE COSTS



GREENING THE GOVERNMENT

- EO 13149
  - FEDERAL FLEET AND TRANSPORTATION EFFICIENCY
- EO 13148
  - LEADERSHIP IN ENVIRONMENTAL MANAGEMENT



EXECUTIVE ORDER 13149

- APRIL 21 2000
- FEDERAL FLEET AND TRANSPORTATION EFFICIENCY
- REQUIRES LEADERSHIP IN FLEET FUEL ECONOMY, USE OF ALTERNATIVE FUEL VEHICLES, AND ALTERNATIVE FUELS
- TO PROMOTE MARKETS, ENCOURAGE NEW TECHNOLOGY, ENHANCE SELF SUFFICIENCY AND SECURITY AND ENSURE HEALTHIER ENVIRONMENT

REDUCED PETROLEUM FUEL CONSUMPTION

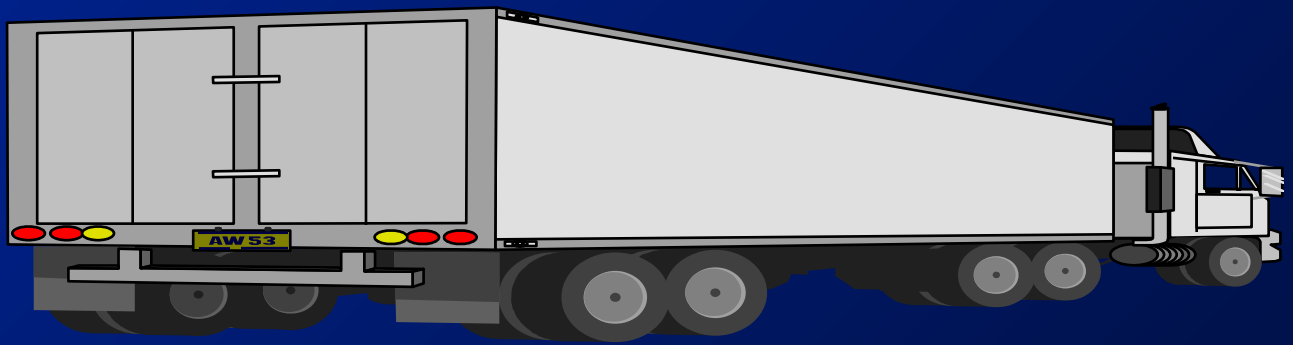
- EACH AGENCY OPERATING 20 + MOTOR VEHICLES WITHIN U.S. SHALL REDUCE ITS ENTIRE VEHICLE FLEET'S ANNUAL PETROLEUM CONSUMPTION BY 20% BY TH END OF FY 2005.

PERFORMANCE STRATEGIES

- USE OF ALTERNATIVE FUELS
- ACQUISITION OF HIGHER FUEL ECONOMY VEHICLES (HYBRIDS)
- SUBSTITUTION OF CARS FOR LIGHT TRUCKS
- INCREASE IN VEHICLE LOAD FACTORS
- DECREASE IN VEHICLE MILES TRAVELED
- DECREASE IN FLEET SIZE

REQUIREMENTS

- **MUST INCREASE AVERAGE FUEL ECONOMY RATING**
  - **BY AT LEAST ONE MILE PER GALLON BY END OF FY 2002**
  - **3 MPG BY END OF FY 2005**



PROCUREMENT RULES

- NO PURCHASE OF VIRGIN OIL
- MUST FOLLOW GUIDELINE ITEM RULES
- NOT JUST RETREAD TIRES BUT
  - ➡TIRES WITH POST CONSUMER RECOVERED RUBBER
  - USE BIO BASED MOTOR VEHICLE PRODUCTS? CONFLICT!
- APPLIES TO GOCO VEHICLES

EXCEPTIONS

- PURCHASE REREFINED OILS AND RETREAD TIRES WHEN:
  - ➡ REASONABLY AVAILABLE AND
  - ➡ MEET THE MANUFACTURER'S RECOMMENDED PERFORMANCE STANDARDS
- MILITARY TACTICAL, LAW ENFORCEMENT, AND EMERGENCY VEHICLES
  - ➡ MUST SUBMIT EXEMPTION ANNUALLY
  - ➡ MUST STILL REDUCE FUEL CONSUMPTION

EXECUTIVE ORDER 13148

- 22 APRIL 2000
- GREENING GOVERNMENT THROUGH LEADERSHIP IN ENVIRONMENTAL MANAGEMENT
- HEAD OF AGENCY MUST INTEGRATE ENVIRONMENTAL ACCOUNTABILITY INTO AGENCY PROCESSES

GOALS

- MANAGEMENT AND COMPLIANCE
- RIGHT TO KNOW/POLLUTION PREVENTION
- TOXIC RELEASE REDUCTION
- TOXIC/HAZARDOUS USE REDUCTION
- OZONE DEPLETING SUBSTANCES REDUCTION

RELEASE REDUCTIONS

- MUST REDUCE TOTAL RELEASES OF TOXIC CHEMICALS AND OFF-SITE TRANSFERS FOR TREATMENT BY 10% YEARLY OR 40% OVERALL DEC 2006
- MAY REQUEST WAIVER TO EPA
- ACCOMPLISHED THRU INNOVATIVE POLLUTION PREVENTION, FACILITY MANAGEMENT AND SOUND ACQUISITION AND PROCUREMENT PRACTICES

USE REDUCTION

- TOXIC/HAZARDOUS SUBSTANCES
- REDUCE BY 50% BY DEC 2006
- ACHIEVED BY PURCHASE OF IDENTIFIED PROVEN SUBSTITUTES, POLLUTION PREVENTION, AND FACILITY MANAGEMENT

OZONE DEPLETING SUBSTANCES

- MAXIMIZE USE AND PURCHASE OF SAFE ALTERNATIVES
- EVALUATE PRESENT AND FUTURE USE (INCLUDING RECYCLING PLANS)

ACQUISITION AND PROCUREMENT

- LIMITING PROCUREMENT
- ENVIRONMENTALLY BENIGN ADHESIVES
- EXEMPTIONS

LIMITING PROCUREMENT

- TOXIC CHEMICALS, HAZARDOUS SUBSTANCES, OTHER POLLUTANTS
- MUST IMPLEMENT TRAINING PROGRAMS
  - ➨FOR PROCUREMENT OFFICIALS
- ASSESS FEASIBILITY OF CENTRALIZED PROCURMENT AND DISTRIBUTION PROGRAMS (PHARMACY)
- REVIEW SPECS TO ID USE REDUCTIONS

ENVIRONMENTALLY BENIGN ADHESIVES

- 12 MONTHS AFTER ENVIRONMENTALLY BENIGN PRESSURE SENSITIVE ADHESIVES FOR PAPER PRODUCTS ARE COMMERCIALLY AVAILABLE
- MUST REVISE SPECS FOR PAPER PRODUCTS USING ADHESIVES AND DIRECT THESE PURCHASES
- WHENEVER TECHNICALLY PRACTICABLE AND COST EFFECTIVE

EXEMPTIONS

- NATIONAL SECURITY EXEMPTIONS
- HEAD OF AGENCY REQUEST EXEMPTION
  - ➡SPECIFIED PERIOD OF TIME
  - NOTICE PROVIDED
  - LACK OF APPROPRIATION
- COST EFFECTIVE
- TECHNICALLY PRACTICABLE
- OTHERS?

POLICIES, STRATEGIES, PLANS

- FAR COUNCIL SHALL DEVELOP ACQUISITION POLICIES AND PROCEDURES FOR CONTRACTORS TO SUPPLY AGENCIES WITH ALL INFO NECESSARY FOR COMPLIANCE
- ONCE PUBLISHED MUST USE IN ALL APPLICABLE CONTRACTS

QUESTIONS

- DSN - 227-1623
- COMMERCIAL – 703-697-1623
- EMAIL - MEADOWSW@PENTAGON.AF.MIL